

PUBLIC DISCLOSURE

February 4, 2008

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

**SunFirst Bank
Certificate Number 57087**

**120 East Saint George Boulevard
Saint George, Utah 84770**

**Federal Deposit Insurance Corporation
25 Jessie Street at Ecker Square
San Francisco, California 94105**

NOTE: This evaluation is not, nor should it be construed as, an assessment of the financial condition of this institution. The rating assigned to this institution does not represent an analysis, conclusion or opinion of the federal financial supervisory agency concerning the safety and soundness of this financial institution.

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GENERAL INFORMATION

The Community Reinvestment Act (CRA) requires each federal financial supervisory agency to use its authority when examining financial institutions subject to its supervision. The purpose to assess the institution's record of meeting the credit needs of its entire community, including low- and moderate-income neighborhoods, consistent with safe and sound operation of the institution. Upon conclusion of such examination, the agency must prepare a written evaluation of the institution's record of meeting the credit needs of its community.

*This document is an evaluation of the Community Reinvestment Act (CRA) performance of **Sun First Bank** prepared by the **Federal Deposit Insurance Corporation**, the institution's supervisory agency, as of **February 4, 2008**. The agency rates the CRA performance of an institution consistent with the provisions set forth in Appendix A to 12 CFR Part 345.*

INSTITUTION RATING

This institution is rated **Satisfactory**, under the CRA requirements. Sun First Bank's (SFB) CRA performance demonstrates an overall adequate response in meeting the credit needs of its assessment areas, consistent with its resources and capabilities. The following supports this rating:

- SFB's overall distribution of small business loans to businesses of different sizes is considered excellent. The bank's lending patterns to businesses with gross annual revenues (GAR) of equal to or less than \$1 million greatly exceeds the aggregate lending data used for comparison purposes. This represents a strong commitment to the smaller businesses.
- The geographic distribution of loans reflects an adequate dispersion throughout the assessment areas of Washington and Iron Counties, with no unexplained lending gaps identified.
- A majority of small business loans (84 percent) were made within the bank's assessment areas.
- The bank's average loan-to-deposit (LTD) ratio of 95 percent demonstrates reasonable use of funding sources for the provision of credit within the assessment areas given the institution's age, size, financial capacity, and assessment area credit needs.
- The institution has not received any CRA-related complaints since its inception.
- There were no substantive violations found with regard to the provisions of anti-discrimination legislation, including the Equal Credit Opportunity and Fair Housing Acts.

SCOPE OF EXAMINATION

SFB was evaluated using the small bank evaluation guidelines, which is defined by the CRA as a bank that had total assets of less than \$258 billion as of December 31st each of the two prior calendar years. Data used for comparison purposes included: 2006 Dun & Bradstreet small business data; 2006 CRA aggregate small business lending data; and 2006 aggregate HMDA lending data.

For this evaluation, examiners reviewed a sample of 201 small business loans originated in 2006 and 2007. A small business loan by definition of the Consolidated Report of Condition and Income (Call Report) is a business purpose loan with an original amount of \$1 million or less, including loans secured by nonfarm nonresidential properties and commercial and industrial loans. The evaluation also included a smaller review of 25 home mortgage disclosure act (HMDA) loans reported in 2007.

DESCRIPTION OF INSTITUTION

SFB is an independently owned commercial bank with \$192,080 in total loans, \$188,360 in total deposits, and \$229,743 in total assets as of the September 30, 2007.

The bank operates one full-service branch office, including a drive-up and automated teller machine (ATM), from their main headquarters located at 120 East Saint George Boulevard, Saint George Utah. The bank also has two branches (South Bluff and Hurricane) within the Washington County assessment area, and one branch (Cedar City) within the Iron County assessment area.

SFB's principal business strategy is to serve small- and medium-sized businesses within its community, focusing on businesses of \$1 million or less in GAR. The bank provides its customers with a full range of traditional business and personal banking products, such as commercial loans, commercial real estate loans, Small Business Administration (SBA) loans, equipment financing, lot loans, construction loans, residential mortgages, home equity lines of credit, auto loans, and personal consumer loans. In addition, the institution offers a variety of demand deposit and savings products, including NOW, Money Market, and Health Savings. Overdraft protection is also offered.

The bank also makes convenient alternative delivery systems available such as ATM cards, bank by mail, night depository and internet banking. The hours of operation and availability of products and services are tailored to the convenience and needs of bank customers.

The composition of the bank's loan portfolio, as of September 30, 2007, is broken down in Table 1 by type, dollar, and percentages. As shown, approximately 52 percent of the loan portfolio is comprised of commercial loans/commercial real estate, followed by 31 percent construction and land development loans. The majority of the bank's commercial purpose loans are small business loans, originated in amounts of \$1 million or less.

Table 1- Sun First Bank / Composition of Loan Portfolio as of September 30 , 2007 (\$000)		
Loan Type	Dollar	Percent of
Construction and Land Development	59,145	31
Secured by Farmland	3,105	2
1-4 Family Residential		
a) Revolving (Open-End) secured by R/E	980	1
b) Closed-End (Secured by 1 st Lien)	15,983	8
c) Closed-End (Secured by Junior Liens)	6,058	3
Multi-Family (5 or more) Residential	937	Minimal
Secured by non-farm / non-residential properties	67,392	35
Total Real Estate Loans	153,600	80
Commercial/Industrial	32,527	17
Consumer	4,158	2
Other Revolving Line of Credit	2,234	1
Other	59	Minimal
Total Non Real Estate Loan	39,978	20
Less: Unearned Income	(498)	N/A
Total Loans	192,080	100

Source: 9/30/2007 Call Report

DESCRIPTION OF ASSESSMENT AREA

The bank has defined its local assessment areas as Washington County and Iron County. The Washington County assessment area is located in the Saint George, Utah Metropolitan Statistical Area (MSA). The Iron County assessment area is located in a non-MSA. The two counties are adjacent.

Washington County Assessment Area:

As of census year 2000, there were 90,354 people, 29,939 households, and 23,442 families residing in the county. The median income for a household in the county was \$37,212, and the median income for a family was \$41,845. The per capita income for the county was \$15,873. About 7.7 percent of families and 11.2 percent of the population were below the poverty line, including 14.6 percent of those under age 18 and 4.2 percent over the age 65. Cities located within the county include: Apple Valley Enterprise; Hillsdale and Hurricane. Washington County is home to three of the bank's offices. The county is highly dependent on tourism, recreation, and its desirability as a retirement spot, fueling the growth in service and trade industries. The largest employers in the county include Washington School District, Wal-Mart, Intermountain Health Care, Dixie College, St. George City, Federal Government, Washington County and Sky West Airlines.

Iron County Assessment Area:

As of census year 2000, there were approximately 33,779 people, 10,627 households, and 8,076 families residing in the county. The median income for a household in the county was \$33,114, and the median income for a family was \$37,171. The per capita income for the county was \$13,568. About 13.10% of families and 19.20% of the population were below the poverty line, including 20.40% of those under age 18 and 6.50% of these 65 years of age or older. Cities located within this county include: Brian Head; Cedar City; Enoch; Kanarraville; Paragonah; Parowan; Summit; Duck Creek; Beryl; New Castle; Lund; and Hamilton Fort. The county has a diversified economic base with manufacturing and service sectors playing the largest roles. Tourism is also a growing industry due to the extraordinary natural setting and the proximity of attractions such as Bryce Canyon, Zion's National Park, Brian Head Ski & Summer Resort, Utah Shakespearean Festival, and Dixie National Forest. The largest employers for the county include Southern Utah University, Iron County School District, State of Utah, Wal-Mart, Stewardship Financial Inc., Valley View Medical Center, Federal Government, Brian Head Resort, Inc., Smead Manufacturing, and Iron County.

The following three tables (Tables 2 through 4) show the demographics for Washington County, Iron County, and the two counties combined.

Table 2- Sun First Bank / WASHINGTON COUNTY DEMOGRAPHICS					
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #
Geographies (Census Tracts)	18	0%	11%	72%	17%
Population by Geography	90,354	0%	10%	72%	18%
Owner-Occupied Housing by Geography	22,144	0%	10%	71%	19%
Businesses by Geography (as of 2006)	11,285	0%	10%	74%	16%
Family Distribution by Tract Income Level	23,639	0%	10%	72%	18%
Distribution of Low and Moderate Income Families throughout AA geographies.	8,497	0%	15%	76%	9%
2006 HUD Adjusted MFI for Washington County	46,900		Median Housing Value		\$131,931
Households Below Poverty Level	10%		Unemployment Rate		2.3%

Source: 2000 US Census and 2007 HUD updated MFI, 2006 Dun and Bradstreet

Table 3- Sun First Bank / IRON COUNTY DEMOGRAPHICS

Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #
Geographies (Census Tracts)	7	0%	29%	71%	0%
Population by Geography	33,779	0%	28%	72%	0%
Owner-Occupied Housing by Geography	7,050	0%	25%	75%	0%
Businesses by Geography (as of 2006)	3,589	0%	33%	67%	0%
Family Distribution by Tract Income Level	8,197	1%	22%	50%	28%
Distribution of Low and Moderate Income Families throughout AA geography.	3,517	0%	36%	64%	0%
2006 HUD Adjusted MFI for Iron County	46,200		Median Housing Value		\$109,951
Households Below Poverty Level	16.76%		Unemployment Rate		3%

Source: 2000 US Census and 2007 HUD updated MFI, 2006 Dun and Bradstreet

Table 4- Sun First Bank / COMBINED ASSESSMENT AREA DEMOGRAPHICS

Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #
Geographies (Census Tracts)	25	0%	16%	72%	12%
Population by Geography	124,133	0%	15%	72%	13%
Owner-Occupied Housing by Geography	50,096	0%	13%	72%	15%
Businesses by Geography (as of 2005)	14,874	0%	16%	73%	12%
Family Distribution by Tract Income Level	31,836	0%	15%	72%	13%
Distribution of Low and Moderate Income Families throughout AA geography.	109,995	0%	21%	72%	6%
Combined 2006 HUD Adjusted MFI	48,760		Median Housing Value		\$125,956
Households Below Poverty Level	12%		Unemployment Rate		2.36%

Source: 2000 US Census and 2007 HUD updated MFI, 2006 Dun and Bradstreet

Community Contact

During the evaluation a non-profit organization was contacted within the Washington County assessment area. The information gathered by this contact revealed that there is a strong ongoing need for affordable housing, including multi-family housing as well as single family residences. Another concern was the need to obtain affordable rates to finance construction loans and lines of credit for improvement purposes.

CONCLUSIONS WITH RESPECT TO PERFORMANCE CRITERIA

Lending in the Assessment Area

Based on the analysis illustrated in Table 5, an overall majority (84 percent by number and 80 percent by dollar) of the bank's small business and HMDA-reportable lending is within the bank's assessment areas.

Table 5- Sun First Bank / Distribution of Commercial Loans Inside and Outside of the Assessment Area										
Year: Loan Type (000s)	Number of Loans					Dollar Volume of Loans				
	Inside		Outside		Total	Inside		Outside		Total
	#	%	#	%		\$	%	\$	%	
2006:										
Small (≤\$1,000 in amount)	71	96%	3	4%	74	7,882	92%	645	8%	8,527
Large (>\$1,000 in amount)	6	75%	2	25%	8	11,004	81%	2,589	19%	13,593
Total Commercial Loans	77	94%	5	6%	82	\$18,886	85%	\$3,234	15%	\$22,120
2007:										
Small (≤\$1,000 in amount)	106	92%	9	8%	115	10,234	83%	2,122	17%	12,356
Large (>\$1,000 in amount)	3	75%	1	25%	4	8,264	87%	1,188	13%	9,452
Total Commercial Loans	109	92%	10	8%	119	\$18,498	85%	\$3,310	15%	\$21,808
Sub Totals of Small Business Loans	186	93%	15	7%	201	\$37,384	85%	\$6,544	15%	\$43,928
*2007 HMDA Loans	25	51%	24	49%	49	\$4,026	50%	\$4,027	50%	\$8,053
Grand Total	211	84%	39	16%	250	\$41,410	80%	\$10,571	20%	\$51,981

Source: Bank Records. Note: The branch office in Iron County has only been open since early 2007.

*The HMDA loans originated outside the AA's were originated in Northern Nevada in an area of exponential and unprecedented growth-30 miles away

Lending to Businesses of Different Sizes

The distribution of small business loans reflects an excellent penetration among businesses of different sizes within the assessment areas. A statistical sample of 201 small business loans was initially reviewed. Of these, 186 loans were originated within the assessment area. Overall, Sun First Bank demonstrates an excellent record of lending to small businesses, based on its large volume of small business loans to businesses with revenues of \$1 million or less. The bank's lending to businesses of different sizes substantially exceeded the aggregate lending data in both 2006 and 2007, for both the number and dollar analyses.

Tables 6 through 9 illustrate the distribution of the 186 randomly selected small business loans by county, the gross annual revenues of the businesses, and comparative data by percentage. The 2006 aggregate data was used for comparative purposes (2007 was not available) and represents the best data available.

Table 6 - WASHINGTON COUNTY - Distribution of Small Business Loans							
By Gross Annual Revenues (Number of Loans)							
Gross Annual Revenues (000s)	% of Total Number of Businesses*	2006 Aggregate Lending**		SFB- Sample***			
				2006		2007	
		#	%	#	%	#	%
< \$250	Break-Down Not Available	Break-Down Not Available		42	60%	52	54%
\$250 to \$500				13	19%	12	12%
\$500 to \$750				3	4%	11	12%
\$750 to \$1,000				1	2%	5	5%
Subtotal (≤ \$1,000)	65%	2,889	38%	59	85%	80	83%
> \$1,000	3%	4,675	62%	10	14%	12	12%
Revenues Not Reported	32%	N/A	N/A	1	1%	5	5%
Total	100%	7,564	100	70	100%	97	100%

Sources: *2006 Dun & Bradstreet Business Data; **FFIEC 2006 CRA Aggregate Small Business Lending Data; ***Loan Sample and Bank Records

Table 7 - WASHINGTON COUNTY - Distribution of Small Business Loans							
By Gross Annual Revenues (Dollar Volume)							
Gross Annual Revenues (000s)	% of Total Number of Businesses*	2006 Aggregate Lending**		SFB- Sample***			
				2006		2007	
		\$ (000)	%	\$(000)	%	\$(000)	%
< \$250	Break-Down Not Available	Break-Down Not Available		4,664	26%	6,211	36%
\$250 to \$500				5,738	32%	2,263	13%
\$500 to \$750				4,617	26%	2,591	15%
\$750 to \$1,000				13	1%	550	3%
Subtotal (≤ \$1,000)	65%	\$72,812	56%	\$15,032	85%	\$11,615	67%
> \$1,000	3%	58,205	44%	2,734	15%	5,294	30%
Revenues Not Reported	32%	N/A	N/A	1	Negligible	591	3%
Total	100%	\$131,017	100%	\$17,767	100	\$17,500	100%

Sources: *2006 Dun & Bradstreet Business Data; **FFIEC 2006 CRA Aggregate Small Business Lending Data; ***Loan Sample and Bank Records

Table 8 - IRON COUNTY - Distribution of Small Business Loans							
By Gross Annual Revenues (Number of Loans)							
Gross Annual Revenues (000s)	% of Total Number of Businesses*	2006 Aggregate Lending**		SFB- Sample***			
				2006		2007	
		#	%	#	%	#	%
< \$250	Break-Down Not Available	Break-Down Not Available		5	72%	9	75%
\$250 to \$500				0	0%	0	0%
\$500 to \$750				0	0%	0	0%
\$750 to \$1,000				0	0%	2	17%
Subtotal (≤ \$1,000)	65%	1011	49%	5	72%	11	92%
> \$1,000	3%	1053	51%	1	14%	0	0%
Revenues Not Reported	32%	N/A	N/A	1	14%	1	8%
Total	100%	2064	100%	7	100%	12	100%

Sources: *2006 Dun & Bradstreet Business Data; **FFIEC 2006 CRA Aggregate Small Business Lending Data; ***Loan Sample and Bank Records.

Table 9 - IRON COUNTY - Distribution of Small Business Loans							
By Gross Annual Revenues (Loan Amounts)							
Gross Annual Revenues (000s)	% of Total Number of Businesses *	2006 Aggregate Lending**		SFB- Sample***			
				2006		2007	
		\$(000)	%	\$(000)	%	\$(000)	%
< \$250	Break-Down Not Available	Break-Down Not Available		294	26%	573	57%
\$250 to \$500				0	0	0	0
\$500 to \$750				0	0	0	0
\$750 to \$1,000				0	0	415	42%
Subtotal (≤ \$1,000)	65%	\$38,111	49%	\$294	26%	\$988	99%
> \$1,000	3%	\$24,082	51%	3	Minimal	0	0
Revenues Not Reported	32%			822*	74%	10	1%
Total	100%	\$62,193	100%	\$1,119	100%	\$998	100%

*This \$ represents 1 large loan that generally skews the data due to the limited overall volume. Iron County branch only open 1 year at exam date

Sources: *2006 Dun & Bradstreet Business Data; **FFIEC 2006 CRA Aggregate Small Business Lending Data; ***Loan Sample and Bank Records.

As noted in the tables above, the bank's performance was similar, and in some cases exceeded the performance as represented by the aggregate data. This generally holds true in all cases, except the lending of 2006 in Iron County, in which the data was skewed by an unusually large-dollar loan coupled with the fact that there were only a few loans made during that year from that office due to its recent opening. This performance level is adequate given the bank's focus on small business lending.

Geographic Distribution of Loans

The geographic distribution of small business loans reflects reasonable dispersion throughout the assessment areas, given the demographics of the assessment areas and the bank's operational age, size, financial capacity, and location. No unexplained lending gaps were identified.

Within Washington County assessment area, the bank's performance of lending in various geographies compares favorably, and occasionally exceeds, the performance represented under the aggregate lending data. Performance is considered good given the emphasis on small business lending. Refer to tables 10 and 11 below.

Table 10- Sun First Bank Geographical Distribution of Small Business Loans (Number of Loans) For the Washington County Assessment Area by Census Tract Income Level							
Census Tract Income Level	% of Total Number of Businesses *	2006 Aggregate Lending**		SFB- Sample***			
				By %			
		2006		2007			
		#	%	#	%	#	%
Low	0%	0	0%	0	0%	0	0%
Moderate	10%	731	10%	3	4%	8	8%
Middle	74%	5,171	68%	51	73%	74	76%
Upper	16%	1,361	18%	16	23%	15	16%
Unknown Tract		301	4%	0	0%	0	0%
Total	100%	7,564	100%	70	100%	97	100%

Source: *June 2006 Dun and Bradstreet Small Business Data, **FFIEC 2006 CRA Aggregate Small Business Lending Data, ***Bank Records.

Table 11- Sun First Bank Geographical Distribution of Small Business Loans (Dollar Value of Loans) For the Washington County Assessment Area by Census Tract Income Level							
Census Tract Income Level	% of Total Number of Businesses *	2006 Aggregate Lending**		SFB- Sample***			
				By %			
		2006		2007			
		\$ (000)	%	\$ (000)	%	\$ (000)	%
Low	0%	0	0%	0	0%	0	0%
Moderate	10%	12,826	10%	899	5%	2,760	16%
Middle	74%	88,276	67%	16,058	90%	12,923	74%
Upper	16%	24,390	19%	810	5%	1,817	10%
Unknown Tract		5,525	4%	0	0%	0	0%
Total	100%	\$131,017	100%	\$17,767	100%	\$17,500	100%

Source: *June 2006 Dun and Bradstreet Small Business Data, **FFIEC 2006 CRA Aggregate Small Business Lending Data, ***Bank Records.

Geographical lending patterns are shown for Iron County in the tables below (12 and 13). Less weight was given to this analysis due to the limited number of loans originated and the short length of time the branch has been open. There are only 2 moderate-income census tracts in Iron County.

Table 12- Sun First Bank							
Geographical Distribution of Small Business Loans (Number of Loans) For the Iron County Assessment Area by Census Tract Income Level							
Census Tract Income Level	% of Total Number of Businesses *	2006 Aggregate Lending**		SFB– Sample***			
				2006		2007	
				#	%	#	%
Low	0%	0	0%	0	0%	0	0%
Moderate	33%	34	34%	0	0%	0	0%
Middle	67%	61	61%	7(note)	100%	12 (note)	100%
Upper	0%	0	0%	0	0%	0	0%
Unknown Tract	0%	5	5%	0	0%	0	0%
Total	100%	100	100%	7	100%	12	100%

NOTE: The single office in Iron County has only been in existence 1 year as of the examination date
Source: * 2006 Dun and Bradstreet Small Business Data, **FFIEC 2006 CRA Aggregate Small Business Lending Data, ***Bank Records.

Table 13- Sun First Bank							
Geographical Distribution of Small Business Loans (Dollar Value of Loans) For the Iron County Assessment Area by Census Tract Income Level							
Census Tract Income Level	% of Total Number of Businesses*	2006 Aggregate Lending**		SFB– Sample***			
				2006		2007	
				\$ (000)	%	\$ (000)	%
Low	0%	0	0%	0	0%	0	0%
Moderate	33%	21,982	35%	0	0%	0	0%
Middle	67%	38,680	62%	1,119	100%	998	100%
Upper	0%	0	0%	0	0%	0	0%
Unknown Tract		1,531	3%	0	0%	0	0%
Total	100%	\$62,193	100%	\$1,119	100%	\$998	100%

NOTE: The single office in Iron County has only been in existence 1 year as of the examination date
Source: * 2006 Dun and Bradstreet Small Business Data, **FFIEC 2006 CRA Aggregate Small Business Lending Data, ***Bank Records.

HMDA-Reportable Loans

The following tables illustrate the HMDA-reportable loans for 2007. Data for 2006 was not included in this evaluation since there were only 10 originations for 2006, and any analyses performed would provide meaningful conclusions. The loan review for 2007 confirmed that 25 consumer real estate loans were originated within the bank's assessment areas and are described in the tables below:

Table 14 - Distribution of HMDA-Reportable Loans by Geography St. George – WASHINGTON COUNTY - MSA 41100 AND IRON COUNTY (Combined) - 2007							
Census Tract Income Level	Total Percentage of Tracts within the MSA/Iron County %	2006 Aggregate Lending Income Data by Number and Dollar Percentage *		Bank's Performance			
				Number of Loans Originated		Dollar Volume (000) of Loans Originated	
		#	\$\$	#	%	\$	%
Low	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Moderate	11 / 29	9%	9%	5	20%	769	19%
Middle	72 / 71	70%	66%	15	60%	1,931	48%
Upper	17 / 0	21%	25%	5	20%	1,326	33%
N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Total	100%	100%	100%	25	100%	\$4,026	100%

*Sources: 2006 MSA Aggregate Report HMDA Lending Data; **Bank LAR and Records.

Table 15 - Distribution of HMDA-Reportable Loans by Borrower Income St. George - MSA 41100 AND IRON COUNTY (Combined) - 2007							
Borrower Income Levels	Total Families by Income Level MSA/Iron County by %	2006 Aggregate Lending Income Data by Number and Dollar Percentage *		Bank's Performance			
				Number of Loans Originated		Dollar Volume (000) of Loans Originated	
		#	\$\$	#	%	\$	%
Low	16 / 21	1%	0.5%	1	4%	38	1%
Moderate	20 / 21	7%	4%	5	20%	337	8%
Middle	26 / 25	17%	11.5%	3	12%	531	13%
Upper	38 / 33	75%	84%	16	64%	3,120	78%
N/A				N/A	N/A	N/A	N/A
Total	100%	100%	100%	25	100%	\$4,026	100%

*Sources: 2006 MSA Aggregate Report HMDA Lending Data; **Bank LAR and Records.

An analysis of the bank's lending performance relative to HMDA-lending based on geography and borrower income generally parallels or exceeds the aggregate data and indicates satisfactory performance, especially in light of the bank's primary focus of commercial lending. Less weight is given to this area of the bank's lending programs due to the relatively small volume in contrast to its business lending.

Loan-To-Deposit Ratio

The bank's LTD ratio shows adequate responsiveness to the assessment areas' credit needs given its business focus, asset size, and financial condition. Between March 2003 and September 2007, the average LTD ratio was 95 percent, as calculated from the quarterly Reports of Income and Condition (Call Report). Since the last CRA examination the institution's ratio has decreased from 103 percent as of March 2003 to 84 percent as of September 2007. Overall the bank's average loan-to-deposit ratio is considered appropriate, and illustrates a commitment to the application of funding sources for meeting the assessment areas credit needs.

Table 14 below lists the institution's quarterly LTD ratio since the institution's last CRA evaluation of January 6, 2003.

Table 14 -Sun First Bank / Quarterly Net Loan-to Deposit Ratios	
Call Report Date	Ratio (%)
09/30/2007	84%
06/31/2007	87%
03/31/2007	89%
12/31/2006	103%
09/30/2006	100%
06/30/2006	99%
03/31/2006	93%
12/31/2005	95%
09/30/2005	97%
06/30/2005	93%
03/31/2005	90%
12/31/2004	90%
09/30/2004	89%
06/31/2004	86%
03/31/2004	97%
12/31/2003	98%
09/30/2003	105%
06/30/2003	100%
03/31/2003	103%
Average Loan-to-Deposit Ratio over Nineteen Quarters	95%

Source: Call Reports

Response to Complaints

A review of FDIC records, as well as the bank's CRA Public File, did not reveal any complaints relating to the bank's CRA performance since the last public evaluation of January 6, 2003.

Compliance with Anti-discrimination Laws and Regulations

No violations of the substantive provisions of the anti-discriminatory laws and regulations were identified during the evaluation.